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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK	[	
*	4 &	71
In re:	:	Chapter 11
	;	
	:	Case No. 05-44481 (RDD)
DELPHI CORP., et al.,		(Jointly Administered)
	:	
Debtors.	;	
	;	
·	X	

## NOTICE OF RECLAMATION DEMAND OF HITACHI AUTOMOTIVE PRODUCTS (USA), INC.

PLEASE TAKE NOTICE that a written reclamation demand (the "Hitachi Demand") was delivered on October 18, 2005 by Hitachi Automotive Products (USA), Inc., through counsel, on the captioned debtors and their counsel. A copy of the Hitachi Demand is attached as <a href="Exhibit 1">Exhibit 1</a> and incorporated herein by reference.

SPECTOR & EHRENWORTH, P.C.

Attorneys for Hitachi Automotive Products (USA), Inc.

Brian D Spector (BS/7343)

Dated: October 18, 2005

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Attorneys at Law

30 Columbia Turnpike, Florham Park, New Jersey 07932-2261

973.593.4800 Fax: 973.593.4848 Writer's E-mail: bspector@selawfirm.com

October 18, 2005

ALL PARTIES ON ATTACHED SERVICE LIST

Re:

Delphi Corp., et al., Debtors Case No. 05-44481(RDD) Our File No. H105.0001.0001

Dear Sir/Madam:

This law firm represents Hitachi Automotive Products (USA), Inc. ("HAP"). It has come to our attention that Delphi Corporation and its United States subsidiaries or affiliates (collectively, "Delphi") filed voluntary petitions commencing cases under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code"). Within the last 20 days, HAP delivered goods and supplies to Delphi, which were sold to Delphi on credit and received by Delphi at a time when we now believe Delphi was insolvent.

Demand is hereby made on behalf of HAP pursuant to Section 2-702 of the Uniform Commercial Code and Section 546(c) of the Bankruptcy Code, and/or other applicable law, for the return to HAP of all goods and supplies sold on credit to and received by Delphi from HAP on or after September 28, 2005 for which payment has not been made. Some or all of such goods and supplies are more particularly identified on Schedule 1 attached hereto. This reclamation demand is made without prejudice to HAP's right to make one or more subsequent such demands for the return to HAP of any goods and supplies not identified on the attached Schedule 1 that were sold on credit to and received by Delphi for which payment has not been made.

This letter serves as notice to Delphi that HAP asserts its demand to reclaim the aforementioned goods and supplies.

Such goods and supplies should be returned to HAP and should not be used or disposed of in any way.

Please contact the undersigned with any questions.

Brian D Speder Isan

Very truly yours,

Brian D. Spector

BDS/kd

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ce: U.S. Bankruptcy Court Clerk Tillie Lim, Esq. (FedEx #850762921132) (First-Class Mail)

## SCHEDULE I

			HAP					
		DELPHI	PRODUCT	Date	DUE		UNIT	
SHIP TO LOCATION	INVOICE#	PART#	CODE	Shipped	DATE	QTY	PRICE	Amount
ROCHESTER, NY E&C	0119638	25341848	890921	09/23/05	11/2/05	4968	28.53	141,737.04
ROCHESTER, NY E&C	0119638	25357547	892137	09/23/05	11/2/05	648	26.97	17,476.56
ROCHESTER, NY E&C	0119702	25341848	890921	09/23/05	11/2/05	5184	28.53	147,899.52
ROCHESTER, NY E&C	0119702	25357547	892137	09/23/05	11/2/05	432	26.97	11,651.04
ROCHESTER, NY E&C	0119742	25341848	890921	09/27/05	11/2/05	3888	28.53	110,924.64
ROCHESTER, NY E&C	0119742	25357547	892137	09/27/05	11/2/05	324	26.97	8,738.28
ROCHESTER, NY E&C	0119785	25341848	890921	09/28/05	11/2/05	4536	28.53	129,412.08
ROCHESTER, NY E&C	0119785	25357547	892137	09/28/05	11/2/05	324	26.97	8,738.28
ROCHESTER, NY E&C	0119832	25341848	890921	09/29/05	12/2/05	5184	28.53	147,899.52
ROCHESTER, NY E&C	0119876	25341848	890921	10/03/05	12/2/05	5616	28.53	160,224.48
ROCHESTER, NY E&C	0119926	25341848	890921	10/03/05	12/2/05	5616	28.53	160,224.48
ROCHESTER, NY E&C	0119926	25357547	892137	10/03/05	12/2/05	432	26.97	11,651.04
ROCHESTER , NY E&C	0119978	25341848	890921	10/03/05	12/2/05	5616	28.53	160,224.48
ROCHESTER, NY E&C	0119978	25357547	892137	10/03/05	12/2/05	432	26.97	11,651.04
ROCHESTER, NY E&C	0120028	25341848	890921	10/05/05	12/2/05	5184	28.53	147,899.52
ROCHESTER, NY E&C	0120028	25357547	892137	10/05/05	12/2/05	648	26.97	17,476.56
ROCHESTER, NY E&C	0120074	25341848	890921	10/06/05	12/2/05	5184	28.53	147,899.52
ROCHESTER, NY E&C	0120074	25357547	892137	10/06/05	12/2/05	648	26.97	17,476.56
ROCHESTER, NY E&C	0120122	25341848	890921	10/07/05	12/2/05	5616	28.53	160,224.48
ROCHESTER, NY E&C	0120122	25357547	892137	10/07/05	12/2/05	324	26.97	8,738.28
ROCHESTER, NY E&C	0120176	25341848	890921	10/07/05	12/2/05	5184	28.53	147,899.52
CHIHUAHUA, MX	0119571	25341848	890921	09/22/05	11/2/05	<b>8</b> 64	28.53	24,649.92
CHIHUAHUA, MX	0119709	25341848	890921	09/27/05	11/2/05	432	28.53	12,324.96
CHIHUAHUA, MX	0119790	25341848	890921	09/28/05	11/2/05	2052	28.53	58,543.56
CHIHUAHUA, MX	0119825	25341848	890921	09/29/05	11/2/05	324	28.53	9,243.72
CHIHUAHUA, MX	0119943	25341848	890921	10/04/05	12/2/05	756	28.53	21,568.68
CHIHUAHUA, MX	0120024	25341848	890921	10/05/05	12/2/05	756	28.53	21,568.68
CHIHUAHUA, MX	0120071	25341848	890921	10/06/05	12/2/05	864	28.53	24,649.92
CHIHUAHUA, MX	0120119	25341848	890921	10/07/05	12/2/05	648	28.53	18,487.44
CHIHUAHUA, MX	0120169	25341848	890921	10/07/05	12/2/05	1080	`28.53	30,812.40
FLINT, MI	0119635	25322254	892058	09/23/05	11/2/05	800	17.09	13,672.00
FLINT, MI	0119635	25365003	891094	09/23/05	11/2/05	288	14.78	4,256.64

FLINT, MI	0119694	25322254	891094	09/26/05	11/2/05	144	14.78	2,128.32
FLINT, MI	0119694	25330896	891210	09/26/05	11/2/05	320	14.78	4,729.60
FLINT, MI	0119694	25365003	892058	09/26/05	11/2/05	800	17.09	13,672.00
FLINT, MI	0119738	25322254	891094	09/27/05	11/2/05	1008	14.78	14,898.24
FLINT, MI	0119738	25365003	892058	09/27/05	11/2/05	1600	17.09	27,344.00
FLINT, MI	0119791	25322254	892058	09/28/05	11/2/05	800	17.09	13,672.00
FLINT, MI	0119824	25322254	891210	09/29/05	11/2/05	400	14.78	5,912.00
FLINT, MI	0119824	25330896	892058	09/29/05	11/2/05	960	17.09	16,406.40
FLINT, MI	0119868	25322254	891094	10/03/05	12/2/05	144	14.78	2,128.32
FLINT, MI	0119868	25330896	891210	10/03/05	12/2/05	560	14.78	8,276.80
FLINT, MI	0119868	25365003	892058	10/03/05	12/2/05	1600	17.09	27,344.00
FLINT, MI	0119944	25365003	891094	10/04/05	12/2/05	720	14.78	10,641.60
FLINT, MI	0120025	25330896	891094	10/05/05	12/2/05	288	14.78	4,256.64
FLINT, MI	0120025	25365003	891210	10/05/05	12/2/05	640	14.78	9,459.20
FLINT, MI	0120082	25322254	891094	10/07/05	12/2/05	1296	14.78	19,154.88
FLINT, MI	0120082	25330896	891210	10/07/05	12/2/05	640	14.78	9,459.20
FLINT, MI	0120082	25365003	892058	10/07/05	12/2/05	800	17.09	13,672.00
FLINT, MI	0120170	25322254	892058	10/07/05	12/2/05	800	17.09	13,672.00
REYNOSA, MX	0119597	28010085	28010085	09/23/05	11/2/05	270	364.77	98,487.90
REYNOSA, MX	0119703	12221593	12221593	09/28/05	11/2/05	10	313.00	3,130.00
REYNOSA, MX	0119883	28010085	28010085	10/04/05	12/2/05	180	364.77	65,658.60
REYNOSA, MX	0120051	28010085	28010085	10/07/05	12/2/05	30	364.77	10,943.10
REYNOSA, MX	0120109	28010085	28010085	10/07/05	12/2/05	60	364.77	21,886.20
ROCHESTER, NY CORE	0003309	25376558	12595829	09/23/05	11/2/05	6	25.47	152.82
ROCHESTER, NY CORE	0003315	12595829BB	12595829BB	10/05/05	12/2/05	1	1,000.00	1,000.00

Total 2,533,930.66

## **SERVICE LIST**

Delphi Corp.

VIA FACSIMILE & FEDEX NO. 850762921121

5725 Delphi Drive

Troy, MI 48098-2815

Delphi

FIRST CLASS MAIL

Electronics & Safety P.O. Box 9005

Kokomo, IN 46904-9005

Jan Marrah

VIA FACSIMILE & FEDEX NO. 850762921176

Delphi Delco Electronics Systems

One Corporate Center

MS: CTLLM

Kokomo, IN 46902

Troy Zerbe

FEDEX NO. 850762921187

Delphi Automotive Systems Energy & Chassis Systems Mail Code 483-400-101 5725 Delphi Drive Troy, MI 48098-2815

John Wm. Butler, Jr., Esq.

VIA FACSIMILE, E-MAIL & FEDEX NO. 850762921143

Skadden, Arps, Slate, Meagher & Flom, LLP

333 W. Wacker Drive

Chicago, Illinois 60606

Kayalyn A. Marafioti, Esq.

VIA FACSIMILE, E-MAIL & FEDEX NO. 850762921154

Skadden Arps Slate Meagher & Flom, LLP

Four Times Square

New York, New York 10036